

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

1 S.A.N.T., INC. (a/k/a 1 SAINT, INC.) d/b/a
TOWN & COUNTRY and d/b/a GATHERINGS
BANQUET & EVENT CENTER, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

BERKSHIRE HATHAWAY INC.; and
NATIONAL FIRE & MARINE INSURANCE
COMPANY,

Defendants.

Civil Action No. 20-862

Judge William S. Stickman IV

**BERKSHIRE HATHAWAY INC.'S MOTION TO DISMISS
BASED ON LACK OF PERSONAL JURISDICTION,
IMPROPER VENUE, AND FAILURE TO STATE A CLAIM**

Berkshire Hathaway Inc. ("Berkshire Hathaway"), moves to dismiss the First Amended Complaint ("Complaint") for lack of personal jurisdiction, improper venue, and failure to state a claim upon which relief can be granted. As explained in more detail in the accompanying Brief, this motion is based upon Plaintiff's failure in its Complaint to plead any facts that establish (a) a basis for either general or specific personal jurisdiction in Pennsylvania; (b) a basis for venue in the Western District of Pennsylvania; or (c) any facts or allegations related to Berkshire Hathaway. In support of its Motion, Berkshire Hathaway submits the Declaration of Daniel Jaksich, attached as Exhibit 1.

Respectfully submitted,

/s/ Robert L. Byer

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